

GGI ITPG GLOBAL TAX SUMMIT
22-25 FEBRUARY 2018
MARBELLA, SPAIN

**INCORPORATING THE GGI GLOBAL MOBILITY SOLUTIONS PG MEETING, THE GGI
INDIRECT TAXES PG MEETING & THE GCG M&A DEALMAKERS MEETING**



Hosted by:



a b o g a d o s

Javier Carretero y Asociados – Abogados

Hotel Fuerte Marbella

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Dress Code: Smart Casual

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DELEGATE PROGRAMME

Wednesday, 21 February 2018

19:45 – 22:00 **OPTIONAL** Early Arrivals Dinner
Restaurante Buenaventura, Plaza de la Iglesia de la Encarnación 5, 29601 Marbella
Dress Code: Casual
Meeting Point: Hotel Lobby

Thursday, 22 February 2018

11:30 – 13:00 **GGI Global Mobility Solutions Practice Group Meeting** Huub Kapel
Sevilla Meeting Room

Due to the specific 'tax' nature of the Global Tax Summit, the Global Mobility Solutions PG will focus on more technical tax subjects, e.g. the explanation of articles 15 (Income from employment) and article 16 (Directors' fees) of the OECD Model Tax Convention and -more importantly- the application and interpretations thereof in various countries. Who is considered to be an "employer"? Does the employee's salary need to be specifically charged? Who is a director according to article 16? Can a director's fee be split in a director's remuneration and employment income?

Also the position of the permanent representative in view of action point 7 of the BEPS, Preventing the Artificial Avoidance of Permanent Establishment Status, will be discussed. When is an individual considered to be a permanent representative in your country? Has this changed in view of action point 7? What is the status of the implementation of this action point in your country?

We will limit the technical explanation/presentation to a minimum to allow all participants to share their thoughts and views after which we will have a better view of the international risks, challenges and opportunities. We and our clients need to be aware that different interpretations may either lead to either double taxation or no taxation in specific cases. Furthermore, the new concept of permanent representative may force our clients to reconsider their business structure and or to consider a reorganisation. Whatever the case will be, these developments will lead to more business opportunities for GGI member firms to work together.

13:00 – 14:00 Lunch
Olivo Restaurant

14:00 – 18:00	<p>GGI Indirect Taxes Practice Group Meeting Steve McCrindle & Sevilla Meeting Room Toon Hasselman</p> <p>1. <i>Interactive Workshop – M&A</i></p> <p><i>Given we will be sharing the venue with our GCG colleagues for the first time and some will participate in one or more of the PG sessions organised, we thought that there would be ‘value-added’ (pun intended) to the whole programme by looking at the Indirect Tax treatment of M&A transactions. For example, if you are a non-VAT registered shareholder selling personal shares in a company would you want your advisers invoice to include an irrecoverable VAT charge? Following an introduction to the subject, we will take a look at matters like Indirect Tax Due Diligence, plus ways of contracting and other planning measures for such work so indirect Taxes do not become an irrecoverable additional cost of such a transaction.</i></p> <p><i>We are trusting that this is also good preparation for the ITPG session the following afternoon that will look at Tax Due Diligence on Cross-Border M&A Transactions. There will be two separate panels which will discuss the income tax and Indirect Tax considerations for due diligence.</i></p> <p>2. <i>Talk Show – Transfer Pricing Adjustments</i></p> <p><i>With the assistance of our talk show guests, we will look at Transfer Pricing Adjustments and their treatment from an Indirect Taxes perspective, ably assisted by Oliver Biernat who will add a Direct Tax perspective.</i></p> <p>3. <i>News Show / VAT Update (in brief)</i></p> <p><i>If we have time, we will also take a look at various jurisdictions and interesting cases from around the world. No doubt there will be conflicts between the right/best accounting, tax and Indirect Taxes treatment of M&A transactions and Transfer Pricing adjustments.</i></p> <p><i>Overall, we are looking to limit the technical content in favour of a practical and hopefully fun session that allows participants to contribute and investigate the business risks, challenges and opportunities. We are also looking to run this session as a truly international one, covering Indirect Taxes in jurisdictions outside the European Union. In this regard, we will be largely reliant on active participation of all those present.</i></p>
15:30 – 16:00	<p>Coffee Break Ensenada Hall</p>
18:45 – 19:45	<p>GGI Hospitality Desk open</p>
19:00 – 19:45	<p>GGI ITPG Global Tax Summit Informal Drinks Ensenada Hall Dress Code: Casual</p>
19:45 – 22:00	<p>GGI ITPG Global Tax Summit Informal Tapas Restaurant Bodega La Venencia Avenida Miguel Cano 15, 29602 Marbella Dress Code: Casual Meeting Point: Hotel Lobby</p>

Friday, 23 February 2018

09:00 – 19:30	GGI Hospitality Desk open
09:30 – 17:30	GGI ITPG Global Tax Summit in the hotel <i>Sevilla Meeting Room</i> <i>Dress Code: Casual</i>
09:30 – 09:35	Welcome and Opening Remarks Robert R. Worthington
09:35 – 09:40	Welcome from the Host Firm María José Rubio
09:40 – 09:45	GGI Welcome Claudio G. Cocca
09:45 – 10:45	Case Study Oliver Biernat <i>Oliver will lead a cross-border tax case study in which we will work in groups to solve a simulated client situation.</i>
10:45 – 11:15	Coffee Break <i>Ensenada Hall</i>
11:15 – 12:30	Case Study (continued) Oliver Biernat
12:30 – 13:00	Presentation & Discussion of Case Study <i>Each group will present their conclusions and solutions.</i>
13:00 – 14:30	Lunch <i>Olivo Restaurant</i>
14:30 – 15:10	US Tax Reform Fernando Lopez
15:10 – 15:30	The Effect of BEPS Action 1 on a South African- and UK-based SaaS Provider Graeme Sagers
15:30 – 16:00	Coffee Break <i>Ensenada Hall</i>
16:00 – 17:00	Panel Discussion: Tax Due Diligence on Cross-Border M&A Transactions <i>Two separate panels will discuss the income tax and indirect tax considerations for tax due diligence. Income tax panellists: Bernard Schwechel, Roberto Cagnazzo, Marc Nideröst and Sergio Finulli. Indirect tax panellists: Toon Hasselman, Aditya Kumar, Bärbel Wierzoch, and Steve McCrindle.</i> <i>GCG members are invited to join this portion of the GGI ITPG Global Tax Summit.</i>
17:00 – 17:30	Yoga for Beginners Ashish Bairagra <i>Ashish will lead an easy yoga session that can be done in your chair and in standing positions on the floor. No previous yoga experience is necessary, and no special clothing is required.</i>

- 19:00 – 19:30 Cocktails in the Hotel before leaving for dinner
Ensenada Hall
Dress Code: Smart Casual
- 19:30 – 23:30 Combined Dinner for GGI Global Tax Summit & GCG Delegates
Restaurante El Gamonal, Avenida Lorenzo Morito Romero S/N,
San Pedro de Alcántara, 29670 Marbella
Dress Code: Smart Casual
Meeting Point: Hotel Lobby

Saturday, 24 February 2018

- 08:30 – 14:00 GGI Hospitality Desk open
- 09:00 – 13:00 **GCG M&A Dealmakers Meeting** in the hotel Claudio G. Cocca,
Carmelo Meeting Room Michael Reiss von Filski &
There is a separate programme available for this meeting Tim van der Meer
only until lunchtime.
- 09:30 – 13:00 **GGI ITPG Global Tax Summit** in the hotel
Sevilla Meeting Room
- 09:30 – 10:00 Cryptocurrencies and Related Tax Issues Tony Nunes
- 10:00 – 10:30 Best Practices Framework for Transfer Pricing Benchmarking Vijesh H. Zinzuwadia &
Ashish Bairagra
- 10:30 – 11:00 Coffee Break
Sevilla Meeting Room
- 11:00 – 12:00 Best Practices Presentation: Growth Strategies by Merging With or Jeffery L. Mowery
Acquiring Other Professional Service Firms
- 12:00 – 12:30 Internal ITPG Matters and award-giving ceremony of IITPG awards Robert R. Worthington &
Oliver Biernat
- 12:30 – 12:50 Living in the South of Spain Santiago Lapausa
- 12:50 – 14:00 Lunch
Olivo Restaurant
- OPTIONAL ACTIVITIES AFTER LUNCH: These are already included in the Registration Fees; there are no additional cost to join them.**
- 14:00 – 18:00 **OPTIONAL** Team-building Event (preferred option for ITPG members)
Meeting Point: Europa I Meeting Room
- 14:00 – 18:00 **OPTIONAL** Excursion to Malaga and the Picasso Museum
Meeting Point: Hotel Lobby
- 19:45 – 23:30 Combined Closing Dinner with GGI Global Tax Summit & GCG Delegates
Trocadero Arena, Playa de Río Real, Carretera N340, km 186, 29600 Marbella
Dress Code: Smart Casual

Sunday, 25 February 2018

Individual Checkout from the hotel no later than 12:00 noon

08:30 – 16:00

OPTIONAL Daytrip to Gibraltar

**Those planning to go to the airport directly after the excursion should already load their suitcases onto the coach at 08:30 am.*

Meeting Point: Hotel Lobby

OPTIONAL EXCURSIONS

Sunday, 25 February 2018, 08:30 – 16:00

OPTIONAL DAYTRIP TO GIBRALTAR

You will get a private tour of the Rock of Gibraltar, together with an English-speaking guide. Your excursion will include a visit to the Europa Point lookout, a visit to St Michael's Caves, and a stop at the Ape Den. Please don't forget that this island is part of the UK (and not included in the Schengen region), so you will need to bring your passport with you for use at the border.

Lunch is not included; you will be able to decide where to have this when you are there.

